

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT: NEW YORK

Case No. 18-CV-6613

SHAKEYA RHODEN, and other similarly situated  
current and former nurses and technician

Plaintiff,

- Against -

NIRANJAN MITTAL,  
NIRANJAN K. MITTAL, PHYSICIAN, PLLC,  
Defendant.

**NOTICE OF MOTION FOR  
DEFAULT**

---

S I R (s):

PLEASE TAKE NOTICE that upon the annexed declaration of Jason Tenenbaum, sworn to on January 28, 2019, and the exhibits annexed thereto, the annexed declaration of Shakeya Rhoden, sworn to on January 28, 2019, and the exhibits annexed thereto, the Memorandum of Law of Jason Tenenbaum, and upon all prior proceedings heretofore had herein, Plaintiff by her undersigned attorney shall move before the Honorable LaShann DeArcy Hall at the United States District Court: Eastern District, New York, at the courthouse located at 225 Cadman Plaza E, Brooklyn, NY 11201 on such day and time as counsel may be heard for the following relief:

- (1) Leave to enter a default judgment, pursuant to Fed. R. Civ. Pro 55(b)(2);
- (2) Such other and further relief as this Court deems just, proper and equitable.

Dated: January 15, 2019  
Garden City, New York

/S Jason Tenenbaum

---

**THE LAW OFFICE OF JASON TENENBAUM, P.C.**  
By: Jason Tenenbaum, Esq.  
Attorneys for the Plaintiff  
595 Stewart Avenue, Suite 400  
Garden City, New York 11530  
Tel: (516) 750-0595  
Fax: (516) 414-2869